REMARKS

This paper is responsive to the Office Action dated February 27, 2006. All rejections and objections of the Examiner are respectfully traversed. Reconsideration and further examination are respectfully requested.

Applicants wish to thank Examiner Sefcheck for his helpful advice and consultation in a telephone interview on May 16, 2006. The contents of this paper are intended to reflect the discussion of the prior art in that interview.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone David A. Dagg, Applicants' Attorney at 617.630.1131 so that such issues may be resolved as expeditiously as possible.

Support for the amendments to the claims made herein may be found throughout the Specification as originally filed, including lines 17-21 of page 26, line 12 on page 27 through line 7 of page 28, and Figure 10.

At paragraphs 1 and 2 of the Office Action, the Examiner rejected claims 1-9, 11-13, 15-23, 25-27, 29-37, 39-41 and 43 for obviousness under 35 U.S.C. 103, again citing United States Patent 5,687,167A of Bertin et al. ("Bertin et al.") in combination with United States Patent 6,771,661B1 of Chawla et al. ("Chawla et al."). At paragraph 3, with regard to claims 10, 14, 24, 28, 38 and 42, the Examiner additionally cited United States Patent 6,459,682B1 of Ellesson et al. ("Ellesson et al."). Applicants respectfully traverse these rejections.

Bertin et al. discloses bandwidth reservations in the context of connection requests, while Chawla et al. teaches modifying the bandwidth of a session at a given time. Ellesson et al. teaches a system for controlling packet traffic in a network of originating, receiving and intermediate nodes.

Nowhere in the combination of Bertin et al. and Chawla et al., or in the combination of Bertin et al., Chawla et al. and Ellesson et al., is there disclosed or suggested any system or method for allocating resources on a network, including:

> installing, at the future reservation time, at least one internet protocol traffic filter in the policy enforcement point, wherein the installing activates the requested reservation of network resources for the destination address on the network, ***wherein the internet protocol traffic filter includes a matching criteria and an action, wherein the matching criteria includes at least one internet protocol network address, and wherein the matching criteria allows the policy enforcement point to identify at least one packet and to perform the action on the packet***. (emphasis added)

as in the present independent claims 1, 15, 29 and 43. The Examiner has cited the "connection reservations" of Bertin et al. as anticipating the feature of installing an internet protocol traffic filter. However, Applicants submit that Bertin et al. includes no specific teaching of how the bandwidth reservation is made in connection requests. Fig. 1 of Bertin et al. shows a connection request 101 followed by path selection 102 and bandwidth reservation 103. Bertin et al. describes the bandwidth reservation step 103 beginning at line 4 in column 13 as follows:

> (103) a Bandwidth Reservation process uses the connection requests to reserve bandwidth on each of the links of the path. This process involves exchange of information (109)

between the origin (access) node (100), the transit nodes (107) on the path, and the destination node (108).

In the above text, Bertin et al. describes using connection requests to reserve bandwidth on each of the links of a path. Applicants respectfully urge that a teaching of reserving bandwidth in some unspecified way, as in Bertin et al., does not disclose or suggest the installation of an internet protocol traffic filter, as in the present independent claims. As is known in the art, bandwidth reservation can be performed in any number of specific ways. For example, bandwidth reservation can simply be accomplished by denying subsequent requests once a maximum amount of bandwidth has been reserved. Nothing in Bertin et al. teaches that bandwidth reservation could be performed using filters of any kind. Neither does the information exchanged during a bandwidth reservation in Bertin et al. include or suggest transferring a filter. At lines 30 through 36 of column 13, Bertin et al. teach that a bandwidth request message 109 includes an identifier of the network connection, as well as representations of the forward and backward request connection bandwidth capacity. This section also shows that Bertin et al. lacks any teaching with regard to installing internet protocol traffic filters.

Chawla et al. and Ellesson et al. are similarly lacking. Chawla et al. describes using filters to only determine routes and queues for incoming packets within a data queuing mechanism (Column 3, lines 35-46), and Ellesson et al. includes no suggestion of even a need or possibility of *installing, at a future reservation time, at least one internet protocol traffic filter in a policy enforcement point, wherein the installing activates a requested reservation of network resources for a destination address on the network, wherein the internet protocol traffic filter includes a matching criteria and an action, wherein the matching criteria includes at least one*

internet protocol network address, and wherein the matching criteria allows the policy enforcement point to identify at least one packet and to perform the action on the packet, as in the present independent claims.

For the above reasons, Applicants respectfully urge that the combination of Bertin et al. and Chawla et al. does not disclose or suggest all the features of the present independent claims 1, 15 and 29, from which claims 2-9, 11-13, 16-23, 25-27, 30-37 and 39-41 depend. Accordingly, the combination of Bertin et al. and Chawla et al. does not form a *prima facie* case of obviousness under 35 U.S.C. 103 with respect to the present independent claims 1, 15, 29 and 43, and dependent claims 2-9, 11-13, 16-23, 25-27, 30-37, 39-41 are believed to be patentable over the combination of Bertin et al. and Chawla et al. for at least the same reasons. Similarly, Applicants respectfully urge that the combination of Bertin et al., Chawla et al. and Ellesson et al. does not disclose or suggest all the features of the present independent claims 1, 15, and 29, that the combination of Bertin et al., Chawla et al. and Ellesson et al. therefore does not form a *prima facie* case of obviousness either under 35 U.S.C. 103 with regard to these independent claims, and dependent claims 10, 14, 24, 28, 38 and 42 are believed to be patentable for at least the same reasons.

Reconsideration of all pending claims is respectfully requested.

For these reasons, and in view of the above amendments, Applicants respectfully urge that all rejections of the Examiner should be withdrawn. This application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

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Date

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